



Nelson Products Company

Chemical Specialists Since 1930

July 16, 1991

US EPA RECORDS CENTER REGION 5



471332

Paul J. Rogers
Superfund Program Management Branch, 5HSM TUB-7
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

This is the reply to your letter/request dated 7/3/91.

Introduction: My name is Thomas Mauthner and I am the Technical Director of Nelson Products Company and I held this position for over 15 years. Nelson Products Company manufactures metal working/finishing products; prior to 1986, the company's name was Nelson Chemicals Company; the name was changed because large parts of the company was sold at that time.

Prior to 1983, Nelson Chemical Company had a fully owned subsidiary, Nelson Industrial Services which operated a licensed chemical treatment plant engaging in the treatment of liquid acids and Cyanide based plating wastes. The Cyanide was treated by chlorination and Sodium Hypochlorite was manufactured at the premises.

Short description of treatment operation: Although I was not involved in the daily operation, I was involved in the process design and general protocol of the waste reception and handling. Daily operations and contact with environmental officials was handled by the plant manager, a graduate chemist supported by at least one engineer. The name of the last plant manager is Norman E. Levitin and this letter includes his recollections. He worked here from 1978-1983.

All the Cyanide and Acid wastes which were picked up by our trucks were brought back to our treatment plant in Detroit and treated usually within 24 hours. All shipments received were reported to the State of Michigan. Our plant was supervised by the Waste Water Division of the City of Detroit; the treatment was carried out in large in-ground tanks and the treated effluent was discharged to the City of Detroit sewer system. Until 1981 we did not produce any solid waste of our own and very little later on; this solid waste was sent to a chemically secured landfill, Wayne Disposal Company in Wayne, Michigan. I can categorically state that Nelson Chemicals Company or Nelson Industrial Services has nothing to do with any Albion Landfill. (the site), neither we nor anybody wlse delivered any waste to the "Site" which originated at any Nelson Companies. I and Mr. Levitin are willing to sign any affidavit statement if required.

We had many customers and I myself do not remember individual companies as most of my time was spent with developing chemical products for our other divisions, however, Mr. Levitin remembers clearly that we picked up waste from Union Steel Products. and it was mostly Cyanide, but we also picked up occasionally some acidic waste.

All the wastes were brought here and treated here: it would have been not only criminal to dump it elsewhere, but it would have been economically stupid; we had a 500,000 gallon treatment system here for Cyanide based wastes and took it from all over the Midwest. Therefore I categorically state that we did not have dealings with the "site" company and it is inconceivable that you have any evidence to the contrary.

As I stated we picked up waste CN from Union Steel; however as far as the questions A-Q concern (page 8-10) we do not have any records to help you because Nelson Industrial Services - the waste treatment company - has been sold in May 1983 to Stablex Corp. Later, I think 1985 Stablex sold the plant and business to American Nu Kem which still operates the plant at the same location under the name of CyanoKem, which is the subsidiary. All our records concerning customers, plant data, invoices, copies of manifests, etc. were transferred to them at the time of the sale and - presumably - they transferred it to American Nu-Kem.

All our personnel who were working for Nelson Industrial Services were also transferred in 1983 to Stablex and then to Nu-Kem. One person, the last plant manager, Mr. Norman Levitin is still working for them and will talk to you if necessary:
His address: American Nu-Kem, CyanoKem Division, regional office:
21850 Melrose
Southfield, Michigan
Phone: 313-353-5880
CyanoKem Plant address (our old plant)
12381 Schaefer
Detroit, Michigan 48227
Phone: 313-933-1850

I interviewed our office manager, Mrs. Alice Haddad, who was with the company during the transfer of the records and she indicated that All records pertaining to the waste business have been transferred by her to the office staff of the buying firm. However, we always issued a "Certificate of Treatment" to our customers, which included the analysis of the load (Cyanide was analysed by ASTM method using "Liebig" distillation) and hopefully you can obtain that from Union Steel. We charged according to CN content and even the bills had our analysis written on them in addition to the total charges. Mrs. Haddad told me we kept records for 7 years therefore she gave them everything covering 1975-1983. Records prior to 1975 were destroyed here. (when dated 7 years before)

Conclusion: Nelson Chemicals, Associates, Industrial Services

was not connected in any way with the Site, as we picked up liquid wastes in bulk from Union Steel and treated it here. I would like to assume in the interest of justice, despite the "request" which did not specify any "charges" as usual, only threats - that we will not get involved in any "Superfund" fiasco as we not only did not contribute to the Site, but helped it by treating the toxic wastes at our plant.

The 2 officers/owners of the company are now deceased (this necessitated the sale of various divisions) and I myself was never an "officer". The Company is now very small, approximately \$1.1M/year sales; in case you still need all the financial information, please let me know, but if possible specify somewhat less.

Sincerely,

NELSON PRODUCTS COMPANY



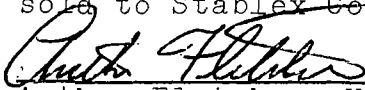
Thomas Mauthner
Technical Director

CC: Jo Lynn Traub, Chief
Superfund Program Management Branch

Enclosure

TM/a

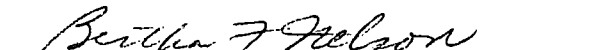
I, Arthur Fletcher, Vice President, hereby state that I reviewed our Business Records and we do not have any paperwork including invoices, pertaining to Nelson Industrial Services (the waste treatment business) sold to Stablax Corporation.



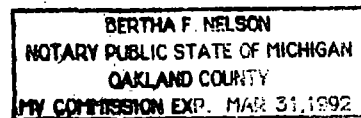
Arthur Fletcher, Vice President

STATE OF MICHIGAN)
COUNTY OF Oakland }

Subscribed and sworn to before me this 16th day of
July, 1991.


Notary Public

My Commission expires Mar 31, 1992



Sosin, Sklar, Rottman, Liefer & Silberberg, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

HILBERT SOSIN, C.P.A.
LAWRENCE SKLAR, C.P.A.
MORRIS M. ROTTMAN, C.P.A.
DENNIS I. LIEFER, C.P.A.
ROBERT SILBERBERG, C.P.A.

JULIE A. MASKIN, C.P.A.

FACSIMILE COVER LETTER

DATE: July 12, 1991TIME OF FAX: 10:30

PLEASE DELIVER THE FOLLOWING PAGES IMMEDIATELY TO:

NAME: Tom MauthnerFIRM: Nelson ProductsFAX #: 933-0913FROM: Hilbert Sosin

FAX #: 855-6802

MESSAGE: _____

_____TOTAL NUMBER OF PAGES INCLUDING COVER LETTER: 2

IF YOU DID NOT RECEIVE ALL THE PAGES, PLEASE CALL:

SOSIN, SKLAR, ROTTMAN, LIEFER & SILBERBERG, PC AT (313) 855-3902

AND ASK FOR Hilbert

4/5/83

SHARE PURCHASE AGREEMENT

This Share Purchase Agreement (the "Agreement") is made and entered into on the 9th day of MAY 1983 between Nelson Chemicals Company ("Shareholder"), a Michigan corporation, being the sole owner of all of the issued and outstanding shares of capital stock of Nelson Industrial Services, Inc., a Michigan corporation ("Nelson Industrial"), Harold Nelson and Morie Nelson (hereinafter sometimes referred to as the "Nelsons"), who collectively own all of the issued and outstanding shares of Nelson Chemicals Company, and Stablex Corporation, a Delaware corporation (the "Purchaser").

The Shareholder owns _____ shares, par value \$_____, of the Common Stock of Nelson Industrial, which will be sometimes referred to herein as the "Shares." No other class of capital stock of Nelson Industrial is authorized.



Nelson Products Company

12345 SCHAEFER HIGHWAY • DETROIT, MI 48227-3499

*Fold at line over top of envelope to the right
of the return address.*

CERTIFIED

P 239 946 140

MAIL

Attention: 5Hsm TUB-7



Paul J. Rogers
Superfund Program Management Branch, 5HSM TUB-7
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604